

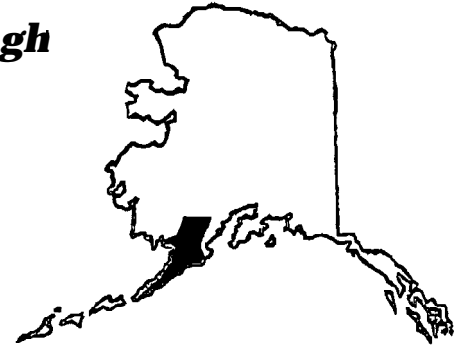
March 22, 2002

Lake and Peninsula Borough

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Jeff Ottesen
Statewide Planning Chief
Department of Transportation
And Public Facilities
3 132 Channel Drive
Juneau, AK. 99801-7898

SUBJECT: Borough Comments / S.W. Alaska Transportation Plan

Dear Mr. Ottesen:

We are writing to forward the Lake and Peninsula Borough's comments regarding the February 2002 version of the Southwest Alaska Transportation Plan. We would like to congratulate the Department for reaching the end of what has been a long and very arduous task. In general, the Borough is pleased with the Plan, however, we still have some concerns with the aviation section. We are particularly pleased with the following:

- Road Corridor Delineation and Reservation: The Borough supports planning for transportation needs beyond what is economically feasible in the next twenty years.
- Inter-Modal Development: The Borough supports the emphasis on inter-modal development in order to increase efficiency and maximize the benefits associated with capital investment.
- Aviation Needs Studies: The Borough supports a comprehensive approach to planning for transportation needs. It therefore supports the concept of planning for road and aviation needs concurrently. We particularly support this approach in the Chignik area.
- Validation of Previously Approved and On-Going Projects: The Borough appreciates the fact that the Plan is clear about its support for projects that are already in progress. We believe this is very important for a variety of reasons, especially with regard to the Iliamna-Nondalton Road,
- Pacific Coast Marine Corridor: The Borough appreciates the Plan's support for additional trips to Southwest by the Tustumena and its support for associated infrastructure improvements.

- Support for Borough Road Priorities: We especially appreciate the Plan's support for the Borough's top three road priorities. We are gratified that DOT/PF has concluded that the benefits associated with these projects are indeed regional in nature.
- Aviation Plan: The Borough supports the parts of the plan which call for all weather approach systems, minimum standards for medi-vac operations, and recognition of the impacts associated with raising insurance costs and the by-pass mail program.

Following is a list of specific comments and concerns:

- Chignik Dock: The information presented on the proposed Chignik Dock is outdated. The City has made a great deal of progress on permitting and design. The cost estimates have also been refined. In addition, any discussion about the inter-modal nature of the dock, the Chignik Inter-Village Road, and Chignik area aviation improvements should include the new Chignik Small Boat Harbor. Construction is scheduled to start this summer.
- Marine Highway System: As noted above, the Borough strongly supports increased service by the Tustemena and improvements to the infrastructure that supports it. We would specifically urge DOT/PF to conduct two trips per month and to increase the number of months in which the communities in Southwest Alaska are served. We remain very disappointed that the Kennecott is not scheduled to serve Southwest Alaska anytime soon. You will recall that the purchase of the Kennecott was strongly supported by the communities and organizations in this region in large part because DOT/PF indicated that it would serve our communities and supplement the Tustemena.
- Aviation System: The Borough remains very concerned that the Plan still does not include a specific set of criteria or a process that would provide for the construction of community airports with a runway length that exceeds the 3,300 feet minimum.

We had been led to believe from conversations with DOT/PF personnel that the Plan would include standards similar to those contained in the Yukon-Kuskokwim Transportation Plan. This Plan provides for flexibility and allows DOT/PF to build runways longer than the minimum standard if certain conditions exist. The S.W. Plan states that it provides a methodology for resolving conflicts over runway lengths on community airports. However, it is not very clear exactly what that methodology is. We understand that DOT/PF is proposing to address this issue through the use of individual airport master plans. This may work in some circumstances. However, we believe there is a benefit to specifically listing the criteria under which longer runways can be considered. This would provide for consistency and give the residents in our communities some assurance that longer runways will be seriously considered if conditions warrant.

Further, we believe that that Design Aircraft Analysis approach used in the Plan is helpful as a planning tool as long as everyone recognizes its limitations. First of all,

this model focuses almost exclusively on passenger service. As we have noted repeatedly, the primary reason for wanting longer runways in this region. is more cost effective freight and fuel delivery. The characteristics of the economy in Southwest are much different than those in the Y-K region. Larger cargo planes are more efficient to operate and longer runways would permit these planes to "back-haul" products. Longer runways would lower the costs of goods and services and stimulate a stagnate economy. In addition, the types of aircraft that are eventually used will be based upon market and business decisions. In short, things can change drastically over the next twenty years and we would hope that the results of this analysis tie not "cast in stone" when design and construction decisions are made in the future.

Finally, we believe that the Essential Air Service Program should be among the factors that are included in your analysis of future trends and needs.

We appreciate the opportunity to comment on the Southwest Alaska Transportation Plan. Please do not hesitate to contact us if you have any questions or need additional information.

Sincerely,

Walt Wrede
Borough Manager